

HUSSEY SEATING COMPANY)	Departmental
YORK COUNTY)	Findings of Fact and Order
NORTH BERWICK, MAINE)	Air Emission License
A-374-71-G-M)	Amendment #1

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

1. Hussey Seating Company (Hussey) was issued Air Emission License A-374-71-F-R on May 25, 2001, permitting the operation of emission sources associated with their boilers and surface coating process, located in North Berwick, Maine.
2. Hussey has requested a minor revision to their license to replace the ESP with several (up to four) Air Flow Systems DC 8 air filtration units.

B. New Equipment

Hussey is authorized to operate the following pollution control equipment, in addition to the equipment in Air Emission License A-374-71-F-R:

1. DC 8 Air Filtration units as best practical treatment (BPT) for welding smoke and fumes on the welding stations in the Chair Fab Shop.

C. Application Classification

The addition of the Air Flow Systems DC 8 air filtration units will not cause an increase in emissions. Therefore it is considered a minor modification, and will be processed as such.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Chapter 100 of the Air Regulations. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in Chapter 100 of the Air Regulations. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

The Air Flow Systems DC 8 air filtration units will achieve up to 98% efficiency in removal of welding smoke and fumes. This unit does not vent to the outside, rather it filters the air and returns it to the shop. As such, there is little consideration for visible emissions being emitted from this source.

Formerly, an ESP was used to achieve BPT, however Hussey recently has been experiencing problems with the ESP. The ESP unit processes fume laden air from the welding benches and re-directs it back into the workplace. The metal that is being welded contains more surface oils than previous stock. The strong electrical charge of the ESP does not adequately remove the fumes from the shop and results in the venting of electrically charged fumes back into the workspace where they form an oily film on walls, ceilings and lighting fixtures.

For these reasons, the ESP is being replaced with several Air Flow Systems DC 8 air filtration units. This new method is now considered BPT.

III. AMBIENT AIR QUALITY ANALYSIS

According to the Maine Regulations Chapter 115, the level of air quality analyses required for a renewal source shall be determined on a case-by case basis. Based on the above total facility emissions, Hussey is below the emissions level required for modeling and monitoring.

ORDER

The Department hereby grants Air Emission License Minor Modification A-374-71-G-M, subject to the conditions found in Air Emission License A-374-71-F-R, and in addition to the following conditions:

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The following are new conditions to Air Emission License A-374-71-F-R

- (24) Air Flow Systems DC 8 air filtration units or its equivalent shall be maintained as a replacement for welding stations in the Chair Fab Shop previously serviced by the ESP unit, in order to remove welding smoke and fumes.
- (25) Visible emissions from the welding stations in the Chair Fab Shop shall not exceed 10% opacity on a six minute block average.
- (26) This amendment shall expire concurrently with Air Emission License A-374-71-F-R.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2001.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 7/26/01

Date of application acceptance: 7/30/01

Date filed with the Board of Environmental Protection: _____

This Order prepared by Jaime Madore, Bureau of Air Quality.